

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X Case No. 20-cv-08088

EDWARD WOODS AND TYRONE HILTON,
individually,

Plaintiffs,

-against-

NOTICE OF MOTION

FITZCON CONSTRUCTION/REN CORP., FITZCON
EXCAVATION, ESCO HIRF CO INC., RONAN
COTTER, *individually*, CORNELIUS O'SULLIVAN,
individually, and MARTIN TEVLIN, *individually*,

Defendants.

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PLEASE TAKE NOTICE, that upon this motion dated January 21, 2022, the Declaration of Melissa Vo, and supporting exhibits, Plaintiffs respectfully move the Court pursuant to Federal Rules of Civil Procedure 55(b) and Local Civil Rule 55.2(b) to enter default judgment in favor of Plaintiff and against Defendants ESCO HIRF CO INC. and MARTIN TEVLIN, on the grounds that said Defendants failed to answer or otherwise defend against the complaint; to set a date for an inquest so that Plaintiff may prove damages; and for such further relief as this Court may deem just and proper.

Dated: New York, New York
January 21, 2022

**PHILLIPS & ASSOCIATES,
ATTORNEYS AT LAW, PLLC**



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